

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

AMERICAN FEDERATION OF )  
GOVERNMENT EMPLOYEES, AFL-CIO )

Plaintiffs, )

v. )

EQUAL EMPLOYMENT )  
OPPORTUNITY COMMISSION, )

Defendant. )

Case No. 1:05CV01035 (RCL)

**DEFENDANT'S UNOPPOSED MOTION FOR AN EXTENSION OF TIME  
TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFFS' COMPLAINT**

For the reasons set forth below, defendant hereby respectfully moves for a 30-day extension of time, to and including July 22, 2005, in which to file the agency's response to plaintiffs' complaint.

1. The defendant's response to plaintiffs' answer is currently due on June 22, 2005. No previous extensions have been granted.

2. Counsel for the government has several deadlines and commitments in other cases, many of which pre-dated the recent assignment of this case.

3. In a telephone conversation on June 21, 2005, plaintiffs' counsel Sarah Starrett advised undersigned counsel that she does not oppose an extension of time, to and including July 22, 2005.

**CONCLUSION**

For the foregoing reasons, the Court should grant the defendant's motion for an extension of time, to and including July 22, 2005, in which to file defendant's response to plaintiffs' complaint.

Dated: June 22, 2005

Respectfully submitted,

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Assistant Attorney General

KENNETH L. WAINSTEIN  
United States Attorney

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